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Gray Davis
Governor

Winston H. Hickox
Secretary for
Environmental
Protection

October 31, 2003

Mr. Jeff Tillman, General Manager
South Tahoe Refuse Company, Inc.
2140 Ruth Avenue
South Lake Tahoe, CA 96150-4357

RE: SITE VISIT DURING SURVEY WEEK SEPTEMBER 8-14, 2003
South Tahoe Refuse Transfer Station - SWIS # 09-AA-0002

Dear Mr. Tillman:

In a continued effort to increase the accuracy of disposal reporting, unannounced site visits at landfills and transfer stations are being conducted throughout the state. The purpose of these visits is to determine whether waste origin information is being collected as required by Title 14 California Code of Regulations (CCR) Sections 18805-18810, and to observe how the surveys are being conducted. These regulations specify that all permitted solid waste facilities are to conduct, at a minimum, quarterly surveys to obtain the jurisdiction(s) of origin for each vehicle load, including self-hauled waste, delivered to the facility during the required survey weeks.

During the origin survey week, September 8-14, 2003, California Integrated Waste Management Board (Board) staff brought waste to South Tahoe Refuse Transfer Station. No questions were asked regarding the origin of the waste at the gatehouse. Board staff identified themselves and explained the purpose of the site visit to the gate attendant. Staff also gave the attendant a letter explaining the survey week site visit.

After observing the procedures at South Tahoe Refuse Transfer Station during the above mentioned survey week, there was no evidence that the facility operator was conducting the required origin survey for the week September 8-14, 2003, as required by the performance standards set forth in Title 14 CCR Section 18805. Further, there is no record of or documentation that the County of El Dorado has requested and received Board approval of an alternate survey week.

The following information clarifies some of the legal requirements for collecting and relaying waste origin information (refer to the attached regulations – Title 14 CCR Chapter 9.2 Disposal Reporting System and Chapter 3, Article 6.3 Record Keeping Requirements):

California Environmental Protection Agency

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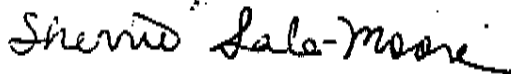
- Minimum of one week per quarter jurisdiction of origin waste surveys to identify in what city or county the waste was produced [Title 14 CCR Section 18805].
- Waste origin information is required to be collected at permitted transfer stations and disposal facilities from every hauler during the specified origin survey weeks: March 8-14, June 8-14, September 8-14, and December 8-14 of each year. Additional survey periods, such as surveying every load everyday, are encouraged but are not required.
- If the one-week per quarter survey is used, the percentage of waste from each jurisdiction during the week is applied to the total tons for the quarter to estimate the tons assigned to each jurisdiction for that quarter.
- Transfer Stations [Title 14 CCR Section 17414(h) & Title 14 CCR Section 18809]
 - State minimum standards require Disposal Reporting System records be kept.
 - Operators must collect jurisdiction of origin information and forward a quarterly report to every Board permitted facility in California to which waste is sent. The report must provide the percentage of waste from each jurisdiction. Information on the percentage of waste from each jurisdiction may be provided at the time each load is delivered to other permitted facilities in lieu of a quarterly report.
 - The jurisdiction of origin and tonnage for any waste that is exported out of state need to be reported to the county/agency in which the transfer station is located.

In order to meet the legal requirements outlined above, transfer stations must collect jurisdiction of origin information on loads received, and supply jurisdiction of origin information to other disposal facilities on loads delivered either at the time of delivery, or within 4 weeks after the end of the quarter.

Please respond to this letter in writing with a detailed explanation of your process for determining the origin of waste disposed at your facility within 30 days of the date of this letter. If a letter is not received within 30 days of the date of this letter, Board staff will consider conducting an inspection of the facility's records in accordance with the Disposal Reporting System Regulations [Title 14 CCR Section 18809] and the Minimum Standards for Solid Waste Handling and Disposal Regulations [Title 14 CCR Section 17414].

If you have any further questions regarding the visit to your facility, please feel free to contact me at (916) 341-6204.

Sincerely,



Sherrie Sala-Moore, Senior
Disposal Reporting Section
Waste Analysis Branch

cc: Sophia Jella
County of El Dorado

Brett Austin
County of El Dorado

Kyle Pogue
California Integrated Waste Management Board

Attachment

**SOUTH TAHOE REFUSE CO., INC.**

December 12, 2003

Sherrie Sala-Moore, Senior
Disposal Reporting Section
California Integrated Waste Management
Waste Analysis Branch
P.O. Box 4025
Sacramento, CA 95812-4025

Dear Ms. Sala-Moore,

This letter is written in response to your letters of July 21, 2003 and October 31, 2003, in regard to site visits during the June and September survey weeks this year at our Transfer Station/Material Recovery Facility at 2140 Ruth Ave., South Lake Tahoe, California. We are sorry for the delay in this response.

Prior to the June 2003, survey week, we had received a notice from your agency that site visits could be expected. We took that opportunity to review survey procedures with each of our two Transfer Station Cashiers, who are responsible for determining jurisdiction of origin for waste that come to our Transfer Station from self-haul loads. A scalehouse computer program was implemented in 2002 that includes jurisdiction of origin criteria along with other pertinent data. We reviewed use of the jurisdiction of origin element of that program with each Transfer Station Cashier as well. Unfortunately, a copy of your July 21, 2003, correspondence did not make it to my attention.

I did receive the notice left with our Cashier on September 11, 2003, and immediately addressed the importance of asking for the jurisdiction from which the waste was generated with both Cashiers. Both Cashiers understood that this discussion was also to be considered a verbal warning for disciplinary purposes. I contacted Mr. Boons at your agency regarding that notice, but did not realize that a letter requiring a response would be issued. We have now resolved our internal paper flow so that correspondence concerning reporting requirements is forwarded to my office. However, we do not anticipate any further problems in meeting our reporting requirements for waste generation purposes.

Since the time of the September site visit, one of the Cashiers has retired. Both the current Senior Cashier, the newly hired Cashier and our backup Cashier were trained in the overall reporting requirements and the specific performance standards of their position pursuant to Title 14 CCR Section 18805 on December 5, 2003, prior to the fourth quarter survey week. During this training the Senior Cashier indicated that he had a better understanding of why the information was need and, therefore, why his cooperation is necessary. I also showed our Senior Cashier a copy of the CIWMB survey week database record of the visit during his shift in June and made it quite clear that we

should be expecting site visits during future survey weeks.

Collection route and direct export waste jurisdiction determinations, as well as compilation of all survey and disposal statistics, are handled by separate procedures through my office. Those records are available for review at any time during business hours.

Your assistance and patience in resolving this issue is appreciated. If you have further questions or concerns, please feel free to contact me at (530) 542-8366.

Sincerely,



Jeanne Lear
Resources Manager

Cc: Jeffery R. Tillman, General Manager, STR
Sophia Jella, El Dorado County Environmental Management
Lemuel Estolas, Placer County Environmental Health
Kyle Pogue, CIWMB